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April 6, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20534

FILED/ACCEPTED

Lynne Hewitt Engledow
Pricing Policy Division
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20534

APR - 6 2011

Federal Communications Commission
Office of the Secretary

Re: CC Docket No. 01-92; GN Docket No. 09-51; WC Docket Nos. 05-337, 07-135,
10-90; Data Related to Universal Service and Intercarrier Compensation Reform

Dear Ms. Dortch and Ms. Hewitt Engledow:

Attached is the redacted response of the National Exchange Carrier Association, Inc. (NECA) to a request (DA 11-575, dated March 29, 2011) from Sharon E. Gillett, Chief – Wireline Competition Bureau. This information is being filed pursuant to the Protective Order issued in this proceeding.¹ In accordance with the Protective Order, this information has been marked:

REDACTED – FOR PUBLIC INSPECTION

Enclosures
cc: Sharon E. Gillett – Chief, WCB

¹ *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *et. al.*, Protective Order, 25 FCC Rcd 13160 (2010).

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Re: CC Docket No. 01-92; GN Docket No. 09-51; WC Docket Nos. 05-337, 07-135,
10-90; Data Related to Universal Service and Intercarrier Compensation Reform

Dear Ms. Dortch and Ms. Hewitt Engledow:

Enclosed please find the National Exchange Carrier, Inc. (NECA) response to a request (DA 11-575, dated March 29, 2011) from Sharon E. Gillett, Chief – Wireline Competition Bureau (Bureau) to Regina McNeil, Vice President and General Counsel – National Exchange Carrier Association, Inc. This information is being filed pursuant to the Protective Order issued in this proceeding.¹

The information supplied by NECA is contained on a CD-Rom accompanying this letter and was compiled from data received in the normal course of business, as well as data obtained through voluntary data requests. In addition, Universal Service data was obtained from the High Cost Disbursement tool available on the Universal Service Administrative Company (USAC) website. The data used for access tariff administration is complete, reliable, and available for all pool members; however, in some instances the Commission has requested data at a more granular level than what NECA collects for access tariff development and pooling settlements. Data from voluntary data requests may not be available for all years requested and is available only for the companies that responded to the voluntary surveys. This voluntary data is included pursuant to the Commission's request but has not been fully verified and may not be completely reliable. A full description of data availability is contained in Attachment 1, as well as a cross reference between the data items requested by the Commission and the Excel spreadsheet contained on the CD-Rom. A template for the data contained on the CD-Rom is included in Attachment 2. Data is provided by study area; however, company and study area names have been masked as previously agreed to by the Commission.

NECA seeks confidential treatment of the information provided on the CD-Rom under the Protective Order. Notwithstanding the Protective Order, the information provided on the CD-Rom is entitled to confidential, non-public treatment under the Freedom of Information Act (FOIA) and related

¹ *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *et. al.*, Protective Order, 25 FCC Rcd 13160 (2010).

provisions of the Commission's rules.² The information satisfies the requirement of FOIA Exemption 4 (trade secrets or commercial/financial information).

NECA submits the following information pursuant to section 0.459 in support of its request for confidential treatment of the data on the CD-Rom.

- Identification of the specific information for which confidential treatment is sought:

NECA seeks confidential treatment for the information on the CD-Rom, which contains confidential and proprietary information related to inter- and intrastate intercarrier compensation revenues, expenses, line counts, usage patterns, other regulated and non-regulated revenues, and long-term debt of NECA pool members.

- Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

This information was submitted in response to a Wireline Competition Bureau request in connection with CC Docket No. 01-92, GN Docket No. 09-51, WC Docket Nos. 05-337, 07-135, and 10-90.

- Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The information on the CD-Rom contains sensitive study area specific information provided by pool members to NECA in its capacity as interstate access tariff and pool administrator. At the study area level, the information is granular and highly confidential to the reporting pool members.

The information provided also includes supplemental items beyond the scope of interstate access administration, including items concerning non-regulated lines of business, that were provided to NECA in conjunction with data requests under the understanding that such information would be kept confidential.

The interstate access and supplemental data is treated as a confidential trade secret by pool members. NECA would not agree to submit the data in response to the Commission staff's request without assurances that the information will be kept confidential. It would be highly inappropriate for the data to be disclosed to the public or third parties.

- Explanation of the degree to which the information concerns a service that is subject to competition:

Rural telephone service has historically lent itself to "cherry picking" by competitors that choose to serve only the low cost areas within a study area. Detailed information about revenues and expenses may help prospective competitors to gain insight to incumbent LEC (ILEC) market strategies and gain competitive advantage. In addition, data on non-regulated services (e.g., video, Internet, etc.) is highly sensitive and commercially valuable. Public disclosure would harm the respondent's competitive position.

- Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The information provided in the attached CD-Rom is made available only to NECA representatives on a need to know basis. Any public information is only made available on an aggregate basis.

² 47 C.F.R. §§ 0.457 and 0.459; 5 U.S.C. § 552, et. seq. Section 0.457(d)(iii) specifically identifies information submitted in connection with audits, investigations, and examination of records pursuant to 47 U.S.C. 220 as material that has been accepted by the Commission on a confidential basis pursuant to 5 U.S.C. 552(b)(4).

- Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The information in the Excel spreadsheet on the CD-Rom is not publicly available.

- Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

NECA requests that all of the data provided on the CD-Rom be treated as confidential indefinitely. Because of the sensitive nature of the data, it would not be appropriate for public disclosure at any time in the foreseeable future.

- Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

By addressing the data request to NECA, the Commission avoided the burden of seeking out the data for 1100+ study areas. However, the Commission should take care to not deprive those ILECs of the opportunity to speak for themselves in the event of a FOIA request for access to data. NECA requests that the Commission notify carriers of any FOIA request and allow them to be given a reasonable opportunity to file detailed information supporting continued confidential treatment of their respective data.

Accordingly, NECA requests confidential treatment of the data provided on the attached CD Rom pursuant to section 0.457 and 0.459 of the Commission's rules and paragraph 4 of the Protective Order. Pursuant to the Protective Order, NECA has marked the Excel spreadsheet on the CD-Rom and each page of the non-redacted version of this filing as follows:

CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135, 10-90, GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

NECA has also complied with the requirement of the Protective Order for delivery of both the confidential and redacted copies of the filing.


Enclosures

cc: Sharon E. Gillett – Chief, WCB REDACTED – FOR PUBLIC INSPECTION

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Data Summary

* Indicates see comments for details on data availability

Requested by FCC (2008-2010)	Ref # (as shown in row 2 of data file)	Source	2008	2009	2010	Study Area Availability	Comments
1) Interstate Switched Access							
--Revenue by Study Area							
--Revenue by rate element							
--Revenue by originating and terminating							
--MOU by Study Area							
--MOU by rate element							
--MOU by originating and terminating							
--Expense (Rev. Req.) by Study Area							
--Expense (Rev. Req.) by rate element							
--Expense (Rev. req) by originating & terminating							
2) Stratification of residential line count/rates for R1 as of year end 2010							
3) Intrastate Switched Access							
--Revenue by Study Area							
--Revenue by rate element							
--Revenue by originating and terminating							
--MOU by Study Area							
--MOU by rate element							
--MOU by originating and terminating							
--Expense (Rev. Req.) by Study Area							
--Expense (Rev. Req.) by rate element							
--Expense (Rev. req) by originating & terminating							
4) Reciprocal Compensation							
--Revenue by Study Area							
--Revenue by rate element							
--MOU by Study Area							
--MOU by rate element							
--Expense by Study Area							
--Expense by rate element							
5) Additional annual data							
--Local Revenue							
--Federal USF revenue							
--State USF revenue							
--Interstate Special Access revenue							

--Intrastate Special Access revenue							
--NECA settlements revenue							
--Other regulated revenue							
--Total regulated revenue							
--Video revenue							
--Internet revenue							
--Long distance revenue							
--Other non-regulated revenue							
--Total non-regulated revenue							
--Year end penetration rates (video,internet,IXC)							
6) Long term debt broken out by lender							
--Original amount							
--Original term							
--Interest rate							
--Remaining balance							
--Remaining term							
--Annual interest							
--Principal payments							

	1	2	3	4	5	6	7
	Study Area Sequence Number	2008 Inter- SWA Total Rev	2008 Inter- SWA Total Rev not in TS	2008 Inter- SWA LS Rev	2008 Inter- SWA non LS Rev	2008 Inter- SWA RR net of Uncoll.	2008 Inter- SWA Orig Rev
Obs	seq	_2008RG_SWG RSREV	_2008BB_INTER _SW_REV_NON TS	_2008RG_LSRE V	_2008RG_NONL SREV	_2008RG_SWNE TREV	_2008XX_SWRE V_ORIG

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CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHII

8	9	10	11	12	13	14
2008 Inter-SWA Term Rev	2008 Inter-SWA Tot MOU	2008 Inter-SWA Rate MOU	2008 Inter-SWA Orig MOU	2008 Inter-SWA Term MOU	2008 Inter-SWA Tot RR	2008 Inter-SWA LS RR
_2008XX_SWREVT_ERM	_2008_ACCMIN S	_2008XX_SWMOU_RATE	_2008XX_SWMOU_ORIG	_2008XX_SWMOU_TERM	_2008CSAS_SWRRQ	_2008CSAS_LSRRQ

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3ITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51

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2008 Inter-SWA Non LS RR	2008 Inter-SWA Orig RR	2008 Inter-SWA Term RR	2008 Intra-SWA Total Rev	2008 Intra-SWA LS Rev	2008 Intra-SWA non LS Rev	2008 Intra-SWA Orig Rev
_2008CSAS_NO NLSRRQ	_2008XX_SWRR _ORIG	_2008XX_SWRR _TERM	_2008BB_STAT E_SW_REVENU E	_2008XX_STATE _SWREV_LS	_2008XX_STATE _SWREV_NONL S	_2008XX_STATE _SWREV_ORIG

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CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET

22	23	24	25	26	27	28
2008 Intra- SWA Term Rev	2008 Intra- SWA Tot MOU	2008 Intra- SWA Rate MOU	2008 Intra- SWA Orig MOU	2008 Intra- SWA Term MOU	2008 Intra- SWA Tot RR	2008 Intra- SWA LS RR
_2008XX_STATE _SWREV_TERM	_2008BB_STAT E_MOU	_2008XX_STATE _SWRATE	_2008BB_STAT E_MOU_ORIG	_2008BB_STAT E_MOU_TERM	_2008XX_STATE _RR	_2008XX_STATE _RR_LS

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NOS. 05-337, 07-135 AND 10-90 AND G¹ CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER

29	30	31	32	33	34	35
2008 Intra- SWA Non LS RR	2008 Intra- SWA Orig RR	2008 Intra- SWA Term RR	2008 Recip Comp Total Rev	2008 Recip Comp Rev by Rate	2008 Recip Comp Tot MOU	2008 Recip Comp Rate MOU
_2008XX_STATE _RR_NONLS	_2008XX_STATE _RR_ORIG	_2008XX_STATE _RR_TERM	_2008RECIP_RE CCOMP	_2008XX_RECIP _REVRATE	_2008RECIP_RE CCOMPMOU	_2008XX_RECIP _RATEMOU

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IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GM CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED)

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2008 Recip Comp Total Exp	2008 Recip Comp Exp by Rate	2008 Local Rev	2008 Federal USF Rev	2008 State USF Rev	2008 Inter SPA Rev	2008 Inter SPA Rev not in TS
_2008RECIP_RE CCOMPPYMT	_2008XX_RECIP _EXPRATE	_2008BB_LOCA L_REVENUE	_2008USF	_2008BB_STAT E_USF_REVENU E	_2008_SPNETR EV	_2008BB_INTER _SP_REV_NONT S

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3ITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-13 CONFIDENTIAL INFORMATION (ADDITIONAL INFORMATION)

43	44	45	46	47	48	49
2008 Intra SPA Rev	2008 Settlements Rev	2008 Other Reg Rev	2008 Total Reg Rev	2008 Video Rev	2008 Internet Rev	2008 Long Dist Rev
<u>_2008BB_STAT</u> <u>E_SP_REVENUE</u>	<u>_2008_TOTSETT</u> <u>REV</u>	<u>_2008BB_OTHE</u> <u>R_REG_REVEN</u> <u>UE</u>	<u>_2008BB_TOTA</u> <u>L_REG_REVEN</u> <u>UE</u>	<u>_2008BB_VIDEO</u> <u>_REVENUE</u>	<u>_2008BB_INTER</u> <u>NET_REVENUE</u>	<u>_2008BB_LONG</u> <u>DIST_REVENUE</u>

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VAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-13 CONFIDENTIAL INFC

50	51	52	53	54	55	56
2008 Other Non Reg Rev	2008 Total Non Reg Rev	2008 YE Pentration Video	2008 YE Pentration Internet	2008 YE Pentration Long Dist	2009 Inter- SWA Total Rev	2009 Inter- SWA Total Rev not in TS
_2008BB_OTHE R_NONREG_RE V	_2008BB_TOTA L_NONREG_RE V	_2008XX_PENE TRATION_VIDE O	_2008XX_PENE TRATION_INTER NET	_2008XX_PENE TRATION_LD	_2009RG_SWG RSREV	_2009BB_INTER _SW_REV_NON TS

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INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-13!

57	58	59	60	61	62	63
2009 Inter-SWA LS Rev	2009 Inter-SWA non LS Rev	2009 Inter-SWA RR net of Uncoll.	2009 Inter-SWA Orig Rev	2009 Inter-SWA Term Rev	2009 Inter-SWA Tot MOU	2009 Inter-SWA Rate MOU
_2009RG_LSREV	_2009RG_NONLSREV	_2009RG_SWNETREV	_2009XX_SWREV_ORIG	_2009XX_SWREV_TERM	_2009_ACCMINS	_2009XX_SWMOU_RATE

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5 AND 10-90 AND GN DOCKET NO. 09-51 CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER

64	65	66	67	68	69	70
2009 Inter-SWA Orig MOU	2009 Inter-SWA Term MOU	2009 Inter-SWA Tot RR	2009 Inter-SWA LS RR	2009 Inter-SWA Non LS RR	2009 Inter-SWA Orig RR	2009 Inter-SWA Term RR
_2009XX_SWMO U_ORIG	_2009XX_SWMO U_TERM	_2009CSAS_SW RRQ	_2009CSAS_LS RRQ	_2009CSAS_NO NLSRRQ	_2009XX_SWRR _ORIG	_2009XX_SWRR _TERM

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IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GM CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED)

71	72	73	74	75	76	77
2009 Intra-SWA Total Rev	2009 Intra-SWA LS Rev	2009 Intra-SWA non LS Rev	2009 Intra-SWA Orig Rev	2009 Intra-SWA Term Rev	2009 Intra-SWA Tot MOU	2009 Intra-SWA Rate MOU
_2009BB_STAT E_SW_REVENUE	_2009XX_STATE _SWREV_LS	_2009XX_STATE _SWREV_NONLS	_2009XX_STATE _SWREV_ORIG	_2009XX_STATE _SWREV_TERM	_2009BB_STAT E_MOU	_2009XX_STATE _SWRATE

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3ITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GM CONFIDENTIAL INFC

78	79	80	81	82	83	84
2009 Intra-SWA Orig MOU	2009 Intra-SWA Term MOU	2009 Intra-SWA Tot RR	2009 Intra-SWA LS RR	2009 Intra-SWA Non LS RR	2009 Intra-SWA Orig RR	2009 Intra-SWA Term RR
_2009BB_STAT E_MOU_ORIG	_2009BB_STAT E_MOU_TERM	_2009XX_STATE _RR	_2009XX_STATE _RR_LS	_2009XX_STATE _RR_NONLS	_2009XX_STATE _RR_ORIG	_2009XX_STATE _RR_TERM

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INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-13!

85	86	87	88	89	90	91
2009 Recip Comp Total Rev	2009 Recip Comp Rev by Rate	2009 Recip Comp Tot MOU	2009 Recip Comp Rate MOU	2009 Recip Comp Total Exp	2009 Recip Comp Exp by Rate	2009 Local Rev
_2009RECIP_9M O_RECCOMP	_2009XX_RECIP _REVRATE	_2009RECIP_9M O_RECCOMPM OU	_2009XX_RECIP _RATEMOU	_2009RECIP_9M O_RECCOMPPY MT	_2009XX_RECIP _EXPRATE	_2009BB_LOCA L_REVENUE

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5 AND 10-90 AND G¹ CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO.

92	93	94	95	96	97	98
2009 Federal USF Rev	2009 State USF Rev	2009 Inter SPA Rev	2009 Inter SPA Rev not in TS	2009 Intra SPA Rev	2009 Settlements Rev	2009 Other Reg Rev
_2009USF	_2009BB_STAT E_USF_REVENU E	_2009_SPNETR EV	_2009BB_INTER _SP_REV_NONT S	_2009BB_STAT E_SP_REVENUE	_2009_TOTSETT REV	_2009BB_OTHE R_REG_REVEN UE

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01-92, WC DOCKET NOS. 05-337, 07-13. CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER

99	100	101	102	103	104	105
2009 Total Reg Rev	2009 Video Rev	2009 Internet Rev	2009 Long Dist Rev	2009 Other Non Reg Rev	2009 Total Non Reg Rev	2009 YE Penetration Video
_2009BB_TOTAL_REG_REVENUE	_2009BB_VIDEO_REVENUE	_2009BB_INTERNET_REVENUE	_2009BB_LONG_DIST_REVENUE	_2009BB_OTHER_NONREG_REVENUE	_2009BB_TOTAL_NONREG_REVENUE	_2009XX_PENETRATION_VIDEO

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IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-13 CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TC

106	107	108	109	110	111	112
2009 YE Pentration Internet	2009 YE Pentration Long Dist	2010 Inter- SWA Total Rev	2010 Inter- SWA Total Rev not in TS	2010 Inter- SWA LS Rev	2010 Inter- SWA non LS Rev	2010 Inter- SWA RR net of Uncoll.
_2009XX_PENE TRATION_INTER NET	_2009XX_PENE TRATION_LD	_2010RG_SWG RSREV	_2010BB_INTER _SW_REV_NON TS	_2010RG_LSRE V	_2010RG_NONL SREV	_2010RG_SWNE TREV

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) PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51 CONFIDENTIAL INFC

113	114	115	116	117	118	119
2010 Inter-SWA Orig Rev	2010 Inter-SWA Term Rev	2010 Inter-SWA Tot MOU	2010 Inter-SWA Rate MOU	2010 Inter-SWA Orig MOU	2010 Inter-SWA Term MOU	2010 Inter-SWA Tot RR Cost
_2010XX_SWREV_ORIG	_2010XX_SWREVT_ERM	_2010_ACCMIN S	_2010XX_SWMOU_RATE	_2010XX_SWMOU_ORIG	_2010XX_SWMOU_TERM	_2010CSAS_SWRRQ

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INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-13!

120	121	122	123	124	125	126
2010 Inter-SWA LS RR	2010 Inter-SWA Non LS RR	2010 Inter-SWA Orig RR	2010 Inter-SWA Term RR	2010 Intra-SWA Total Rev	2010 Intra-SWA LS Rev	2010 Intra-SWA non LS Rev
_2010CSAS_LS RRQ	_2010CSAS_NO NLSRRQ	_2010XX_SWRR _ORIG	_2010XX_SWRR _TERM	_2010BB_STAT E_SW_REVENU E	_2010XX_STATE _SWREV_LS	_2010XX_STATE _SWREV_NONL S

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5 AND 10-90 AND G1 CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO.

127	128	129	130	131	132	133
2010 Intra-SWA Orig Rev	2010 Intra-SWA Term Rev	2010 Intra-SWA Tot MOU	2010 Intra-SWA Rate MOU	2010 Intra-SWA Orig MOU	2010 Intra-SWA Term MOU	2010 Intra-SWA Tot RR
<u>2010XX_STATE</u> <u>_SWREV_ORIG</u>	<u>2010XX_STATE</u> <u>_SWREV_TERM</u>	<u>2010BB_STAT</u> <u>E_MOU</u>	<u>2010XX_STATE</u> <u>_SWRATE</u>	<u>2010BB_STAT</u> <u>E_MOU_ORIG</u>	<u>2010BB_STAT</u> <u>E_MOU_TERM</u>	<u>2010XX_STATE</u> <u>_RR</u>

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01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND G¹ CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) - SUBJECT TC

134	135	136	137	138	139	140
2010 Intra- SWA LS RR	2010 Intra- SWA Non LS RR	2010 Intra- SWA Orig RR	2010 Intra- SWA Term RR	2010 Recip Comp Total Rev	2010 Recip Comp Rev by Rate	2010 Recip Comp Tot MOU
<u>2010XX_STATE</u> <u>_RR_LS</u>	<u>2010XX_STATE</u> <u>_RR_NONLS</u>	<u>2010XX_STATE</u> <u>_RR_ORIG</u>	<u>2010XX_STATE</u> <u>_RR_TERM</u>	<u>2010XX_RECIP</u> <u>_RECCOMP</u>	<u>2010XX_RECIP</u> <u>_REVRATE</u>	<u>2010XX_RECIP</u> <u>_RECCOMPMO</u> <u>U</u>

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